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SEDIMENTS

Subject:
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area Time-Critical Removal Action
Monthly Report (September 2010)

Date:
October 15, 2010

Dear Sam:

Contact:
Steve Garbaciak

Attached is the 15th monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Paragraph 19a of the June 2009 Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action (Docket No. V-W-09-C-925). On August 5, 2009, the United States Environmental Protection Agency (USEPA) determined that future updates on the Former Plainwell Impoundment TCRA project will be included in this monthly report. In accordance with the August 6, 2009 direction of the USEPA, monthly reports will only be submitted electronically.

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If you have any questions, please do not hesitate to contact me.

Our ref:
B0064536.0000.00014

Sincerely,

ARCADIS



Stephen Garbaciak Jr., P.E.
Vice President

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**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
PLAINWELL NO. 2 DAM AREA TIME-CRITICAL REMOVAL ACTION**

REPORT #15, SEPTEMBER 2010

**PREPARED BY ARCADIS
OCTOBER 15, 2010
ON BEHALF OF GEORGIA-PACIFIC LLC**

SUBMITTED TO

**SAM BORRIES, ON-SCENE COORDINATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA**

REPORT #15, SEPTEMBER 2010

Significant Developments and Activities During the Period

- On September 1, ARCADIS submitted the 31st *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA* to United States Environmental Protection Agency (USEPA) and the Michigan Department of Natural Resources and Environment (MDNRE).
- On September 3, 8, 9, 14, 16, 24, and 30 ARCADIS submitted to Weston (USEPA subcontractor) copies of turbidity monitoring logs, analytical data, waste manifests and/or chains of custody.
- On September 3 and 14, Weston submitted copies of split sample analytical data to ARCADIS.
- On September 9, ARCADIS submitted the 32nd *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA* to USEPA and MDNRE.
- On September 15, ARCADIS submitted to USEPA the 14th *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area TCRA* for August 2010.
- On September 15, ARCADIS and Georgia-Pacific LLC (Georgia-Pacific) hosted the monthly Stakeholder's Meeting. Representatives from MDNRE attended the meeting. Sam Borries from USEPA participated via telephone.
- On September 15, ARCADIS submitted the 33rd *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA* to USEPA and MDNRE.
- On September 29, ARCADIS submitted the 34th and 35th *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA* to USEPA and MDNRE.
- On September 30, per USEPA request, ARCADIS submitted to USEPA information on volume excavated, linear feet removed, tons of material hauled to the offsite landfill, and area restored.

Data Collected and Field Activities Conducted During the Period

- During the week of September 1, ARCADIS continued excavation in Removal Area 5B and the oxbow; completed installation of the three-sided structure to excavate the mouth of the oxbow; removed re-suspension controls from Removal Area 4B; continued removal of sheet pile from the oxbow; continued removal of the haul road located along the oxbow; and continued transferring water from Staging Area 2 to Staging Area 1 for treatment and discharge. Processed material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal.

Thirteen soil/sediment confirmation samples (TS20467 to TS20479) were collected from Removal Areas 5B, 6, or the oxbow and submitted to TestAmerica Laboratories, Inc. (TAL) or KAR Laboratories,

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Inc. (KAR) for polychlorinated biphenyls (PCB) analysis. USEPA collected a split sample of TS20467 (PD2-090110-19-SD/TS20467). Two surface water samples (TS30185 and TS30187) were collected from the downstream and upstream, respectively, turbidity monitoring locations near Removal Area 6. A duplicate (TS30186) and rinse blank (TS30188) were also collected. The surface water samples and rinse blank were submitted to TAL for PCB analysis. Table A summarizes the samples collected.

- During the week of September 6, ARCADIS completed excavation activities in Removal Area 6; continued excavation activities in the oxbow; completed removal of sheet pile from the oxbow; continued removal of the haul road located along the oxbow; installed sand backfill in the upland portion of Removal Area 5B; and installed river run rock in Removal Area 6. Processed material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal.

ARCADIS and USEPA probed Oxbow grids 3, 4, 7, 8, 24, and 25 to determine whether any soft sediment remained at the conclusion of excavation activities. It was determined that all soft sediment material had been removed to the native riverbed. Confirmation sampling activities in these areas was not required.

Seven soil/sediment confirmation samples (TS20480 and TS20482 to TS20487) and one duplicate sample (TS20481) were collected from Removal Area 6 and the oxbow and submitted to KAR for PCB analysis. USEPA collected a split sample (PD2-090710-20-SD/TS20480) and duplicate (PD2-090710-20-SD-DP/TS20480) of TS20480. Two surface water samples (TS30189 and TS30190) were collected from the downstream and upstream, respectively, turbidity monitoring locations near Removal Area 5B. A rinse blank (TS30191) was also collected. The surface water samples and rinse blank were submitted to TAL for PCB analysis. Table A summarizes the samples collected.

- During the week of September 13, ARCADIS continued removal in the oxbow; completed removal of the three-sided structure used to excavate the oxbow; completed removal of the sheet pile from the oxbow; removed re-suspension controls from Removal Area 6; began decontamination and demobilization of project equipment; completed the removal of the haul road located along the oxbow; continued restoration activities including installation of sand, topsoil, coir log, river run rock, seed, and erosion control blanket in Removal Areas 3B, 5B, and 6; began installation of topsoil along the former haul road located along the oxbow; and continued transferring water from Staging Area 2 to Staging Area 1 for treatment and discharge. Processed material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal.

ARCADIS and USEPA probed Oxbow grids 26 and 29 to determine whether any soft sediment remained at the conclusion of excavation activities. It was determined that all soft sediment material had been removed to the native riverbed. Confirmation sampling activities in these areas was not required.

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Two surface water samples (TS30192 and TS30193) were collected from the downstream and upstream, respectively, turbidity monitoring locations near Removal Area 5B. A rinse blank (TS30194) was also collected. The surface water samples and rinse blank were submitted to TAL for PCB analysis. One set of water samples (W_SA1_X_012) was collected from the water treatment system located at Staging Area 1 and submitted to TAL for PCB and/or total suspended solids (TSS) analysis. Each set of water samples consists of one influent (e.g., W_SA1_In_012), two mid-fluent (e.g., W_SA1_RM_012 and W_SA1_LM_012), and two effluent samples (e.g., W_SA1_RE_012 and W_SA1_LE_012). Table A summarizes the samples collected.

- During the week of September 20, ARCADIS continued excavation activities in Removal Area 5B and the oxbow; began decontamination and demobilization of project equipment; continued restoration activities including installation of sand, topsoil, coir log, river run rock, seed, and erosion control blanket in Removal Areas 4B and 5B; continued installation of topsoil along the former haul road located along the oxbow; and continued transferring water from Staging Area 2 to Staging Area 1 for treatment and discharge. Processed material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal.

Fourteen soil confirmation samples (TS20488 to TS20501) were collected from Removal Area 5B and submitted to KAR for PCB analysis. USEPA collected a split sample of TS20488 (PD2-092110-21-SD/TS20488). Two surface water samples (TS30195 and TS30196) were collected from the downstream and upstream, respectively, turbidity monitoring locations near Removal Area 5B. A rinse blank (TS30197) was also collected. The surface water samples and rinse blank were submitted to TAL for PCB analysis. Two sets of water samples (W_SA1_X_013 and W_SA1_X_014) were collected from the water treatment system located at Staging Area 1 and submitted to TAL for PCB, total phosphorus, and/or TSS analysis. Each set of water samples consists of one influent, two mid-fluent, and two effluent samples. USEPA collected a split sample of W_SA1_LE_014 (PD2-092310-03-WT/W_SA1_LE_014). Table A summarizes the samples collected.

- During the week of September 27, ARCADIS completed excavation activities in Removal Area 5B and the oxbow; continued decontamination and demobilization of project equipment; continued restoration activities including installation of sand, topsoil, coir log, river run rock, seed, and erosion control blanket in Removal Area 5B; completed installation of topsoil along the former haul road located along the oxbow; began decommissioning of Staging Areas 1 and 2; and completed transferring water from Staging Area 2 to Staging Area 1 for treatment and discharge. Processed material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal.

ARCADIS and USEPA probed Oxbow grid 23 to determine whether any soft sediment remained at the conclusion of excavation activities. It was determined that all soft sediment material had been removed to the native riverbed. Confirmation sampling activities in this area was not required.

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One soil confirmation sample (TS20502) and one duplicate (TS20503) sample were collected from Removal Area 5B and submitted to KAR for PCB analysis. Two surface water samples (TS30198 and TS30199) were collected from the downstream and upstream, respectively, turbidity monitoring locations near Removal Area 5B. A rinse blank (TS30200) was also collected. The surface water samples and rinse blank were submitted to TAL for PCB analysis. One set of water samples (W_SA1_X_015) was collected from the water treatment system located at Staging Area 1 and submitted to TAL for PCB, total phosphorus, and/or TSS analysis. Each set of water samples consists of one influent, two mid-fluent, and two effluent samples. A split sample of W_SA1_LE_015 (W_SA1_DUP_006) was collected. One nine part composite topsoil sample (TS10103) was collected and submitted to TAL for PCB, target compound list (TCL) volatile organic compounds, TCL semi-volatile organic compounds, Resource Conservation and Recovery Act metals, TCL pesticides, total organic carbon, grain size, pH, diesel range organics, and gasoline range organics. Table A summarizes the samples collected.

- As of September 30, approximately 17,000 cubic yards of material have been removed from Removal Areas 1, 2, 3A, 3B, 4A, 4B, 5A, 5B, 6, Island 1, Island 2, and the oxbow area. Excavation activities are complete.

Laboratory Data Received During the Period

- During the week of September 1, ARCADIS received analytical data for USEPA split samples, PD2-082610-16-SD/TS20436 (collected in August), PD2-082610-17-SD/TS20445 (collected in August), PD2-083110-18-SD/TS20458 (collected in August), and PD2-090110-19-SD/TS20467 and soil/sediment confirmation samples TS20456 to TS20466 (collected in August), TS20467 to TS20476, and TS20478 to TS20479.
- During the week of September 6, ARCADIS received analytical data for soil/sediment confirmation samples TS20477 and TS20480 to TS20487 and surface water samples TS30179 to TS30184 (collected in August).
- During the week of September 13, ARCADIS received analytical data for USEPA split samples PD2-090710-20-SD/TS20480 and PD2-090710-20-SD-DP/TS20480; and water treatment sample set W_SA1_X_012.
- During the week of September 20, ARCADIS received analytical data for soil confirmation samples TS20489 to TS20498; surface water samples TS30185 to TS30194; and water treatment sample set W_SA1_X_013.
- During the week of September 27, ARCADIS received analytical data for soil confirmation samples TS20499 to TS20503; surface water samples TS30195 to TS30197; and water treatment sample sets W_SA1_X_014 and W_SA1_X_015.

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- ARCADIS is awaiting analytical data for USEPA split samples PD2-092110-21-SD/TS20488 and water treatment split sample PD2-092310-03-WT/W_SA1_LE_014, surface water samples TS30198 through TS30200, and topsoil sample TS10103. The USEPA representative has verbally confirmed that the analytical results for split samples PD2-092110-21-SD/TS20488 and PD2-092310-03-WT/W_SA1_LE_014 were below the respective PCB action limits for confirmation samples (5 mg/kg) and water discharge (monthly average of 2.6×10^{-5} micrograms per liter).

Issues Encountered and Actions Taken

- The PCB concentration in sample TS20488 (8.4 mg/kg) collected from Removal Area 5B, Grid 12 on September 21 exceeded the performance standard of 5 mg/kg. An additional six inches of material was excavated from the area on September 22, and the area was re-sampled (TS20492). The PCB concentration in sample TS20492 (8.1 mg/kg) exceeded the performance standard of 5 mg/kg. An additional 6 inches of material was excavated on September 28 and the area was re-sampled (TS20502) and duplicate (TS20503). PCBs were not detected in samples TS20502 (0.33 mg/kg U) and TS20503 (0.33 mg/kg U). No additional excavation is warranted. The area will be backfilled to grade.
- The PCB concentration in sample TS20441 (8.4 mg/kg) and duplicate TS20442 (8.7 mg/kg) collected from Removal Area 5B, Grid 17A on August 26 exceeded the performance standard of 5 mg/kg. An additional six inches of material was excavated on September 2 and the area was re-sampled (TS20477). The PCB concentration in sample TS20477 (2.9 mg/kg) did not exceed the performance standards of 5 mg/kg. No additional excavation is warranted.
- The PCB concentration in samples TS20457 (14 mg/kg), collected from Removal Area 6, Grid 2 on August 31 exceeded the PCB performance standard of 5 mg/kg. An additional six inches of material was excavated from the area on September 7, and the area was re-sampled (TS20486). PCBs were not detected in sample TS20486 (0.33 mg/kg U). No additional excavation is warranted.
- The PCB concentration in TS20463 (9.3 mg/kg), collected from Removal Area 6, Grid 7 on August 31 exceeded the PCB performance standard of 5 mg/kg. An additional six inches of material was excavated from the area on September 7, and the area was re-sampled (TS20485). The PCB concentration in sample TS20485 (4.3 mg/kg) did not exceed the performance standard of 5 mg/kg established for additional excavation in the oxbow area. No additional excavation is warranted.
- The PCB concentration in TS20465 (10 mg/kg), collected from Removal Area 6, Grid 9 on August 31 exceeded the PCB performance standard of 5 mg/kg. An additional six inches of material was excavated from the area on September 7, and the area was re-sampled (TS20484). The PCB concentration in sample TS20484 (2.9 mg/kg) did not exceed the performance standard of 5 mg/kg established for additional excavation in the oxbow area. No additional excavation is warranted.
- The PCB concentration in TS20474 (14 mg/kg) collected from Removal Area 6, Grid 18 on September 1, exceeded the PCB performance standards of 5 mg/kg. An additional six inches of

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material was excavated from the area on September 7, and the area was re-sampled (TS20483). PCBs were not detected in sample TS20483 (0.33 mg/kg U). No additional excavation is warranted.

- The PCB concentration in sample TS20453 (1.6 milligram per kilogram [mg/kg]) collected from Oxbow Grid 17 on August 27 exceeded the performance standard of 1 mg/kg. PCB performance standard for oxbow confirmation samples is 1 mg/kg for initial samples and 5 mg/kg for samples collected after additional excavation. See Section 5.5 of the Design Report for additional information. An additional six inches of material was excavated from the area on September 1, and the area was re-sampled (TS20475). The PCB concentration in sample TS20475 (5.8 mg/kg) exceeded the performance standard of 5 mg/kg established for additional excavation in the oxbow area. An additional six inches of material was excavated from the area on September 2, and the area was re-sampled (TS20478). PCBs were not detected in sample TS20478. No additional excavation is warranted.
- The PCB concentration in sample TS20476 (1.5 mg/kg) collected from Oxbow Grid 12 on September 1 exceeded the performance standard of 1 mg/kg. An additional six inches of material was excavated from the area on September 2, and the area was re-sampled (TS20479). PCBs were not detected in sample TS20479. No additional excavation is warranted.
- The PCB concentration in sample TS20480 (4.0 mg/kg) collected from Oxbow Grid 27 on September 7 exceeded the performance standard of 1 mg/kg. An additional six inches of material was excavated from the area on September 10, and the area was re-sampled (TS20487). The PCB concentration in sample TS20487 (1.4 mg/kg) did not exceed the performance standard of 5 mg/kg established for additional excavation in the oxbow area. No additional excavation is warranted.

Developments Anticipated During the Next Reporting Period

- During the week of October 1, ARCADIS is scheduled to continue decommissioning of Staging Areas 1 and 2; continue decontamination and demobilization of project equipment; complete installation of coir log, seed, and erosion control blanket in Removal Area 5B; complete water treatment and discharge, and continue loading and transporting processed material to the appropriate landfill.
- During the week of October 4, ARCADIS is scheduled to complete decommissioning of Staging Areas 1 and 2; complete decontamination and demobilization of project equipment; remove river closure signs from locations near the project site; and complete loading and transporting processed material to the appropriate landfill.
- During the week of October 11, ARCADIS is scheduled to begin installation of trees and shrubs in Removal Areas 3B, 4B, 5B, 6, and Island 2.

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- During the week of October 18, ARCADIS is scheduled to complete installation of trees and shrubs in Removal Areas 3B, 4B, 5B, 6, and Island 2 and meet with Georgia-Pacific and USEPA to perform a site inspection for the purpose of assessing removal action construction status.
- During the week of October 25, ARCADIS is expecting to receive a construction completion notification from USEPA. No field activities are scheduled.
- In October, ARCADIS will continue submitting copies of analytical data, waste manifests, and chains of custody from Plainwell No. 2 Dam Area TCRA sampling activities to USEPA.
- As of October 8, ARCADIS no longer submits weekly construction updates to USEPA regarding the Plainwell No. 2 Dam Area TCRA.

Updates to the Former Plainwell Impoundment TCRA

- None

Developments Anticipated During the Next Reporting Period from the Former Plainwell Impoundment TCRA

- In October, ARCADIS is scheduled to finalize and submit to USEPA the bank inspection report, as described in Section 5.6 of the *Final Former Plainwell Impoundment TCRA Design Report*.
- In October, ARCADIS is scheduled to repair the eroded area observed near Removal Area 9B, as described in the 2010 Bank Inspection Report.

Georgia-Pacific LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA
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Table A — Summary of Samples Collected and Data Received in September 2010

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Performance Standard	Response Action / Notes
Soil/Sediment Confirmation Samples									
<i>PD2-082610-16-SD/TS20436</i>	<i>08.26.10</i>	<i>09.03.10</i>	<i>1008404</i>	<i>TriMatrix Laboratories</i>	<i>RA 5B, Grid 15</i>	<i>PCBs</i>	<i>0.19 mg/kg</i>	<i>5 mg/kg</i>	<i>None</i>
<i>PD2-082610-17-SD/TS20445</i>	<i>08.26.10</i>	<i>09.03.10</i>	<i>1008404</i>	<i>TriMatrix Laboratories</i>	<i>Oxbow Grid 14</i>	<i>PCBs</i>	<i>1.6 mg/kg</i>	<i>5 mg/kg</i>	<i>None</i>
<i>PD2-083110-18-SD/TS20458</i>	<i>08.31.10</i>	<i>09.03.10</i>	<i>1009006</i>	<i>TriMatrix Laboratories</i>	<i>RA 6, Grid 3</i>	<i>PCBs</i>	<i>1.5 mg/kg</i>	<i>5 mg/kg</i>	<i>None</i>
TS20456	08.31.10	09.02.10	KAL584	TAL	RA6, Grid 1	PCBs	2.1 mg/kg	5 mg/kg	None
TS20457					RA6, Grid 2	PCBs	14 mg/kg	5 mg/kg	additional excavation and sampling warranted (TS20486)
TS20458 ^a					RA6, Grid 3	PCBs	4.8 mg/kg	5 mg/kg	None
TS20459	08.31.10	09.02.10	KAL584	TAL	RA6, Grid 4	PCBs	0.79 mg/kg	5 mg/kg	None
TS20460					RA6, Grid 5	PCBs	0.29 mg/kg	5 mg/kg	None
[TS20461]						[PCBs]	[0.31 mg/kg]	[5 mg/kg]	[None]
TS20462					RA6, Grid 6	PCBs	0.078 mg/kg	5 mg/kg	None
TS20463					RA6, Grid 7	PCBs	9.3 mg/kg	5 mg/kg	additional excavation and sampling warranted (TS20485)
TS20464					RA6, Grid 8	PCBs	3.2 mg/kg	5 mg/kg	None
TS20465					RA6, Grid 9	PCBs	10 mg/kg	5 mg/kg	additional excavation and sampling warranted (TS20484)
TS20466					RA6, Grid 10	PCBs	2.2 mg/kg	5 mg/kg	None
TS20467 ^a	09.01.10	09.03.10	KAL585	TAL	RA6, Grid 11	PCBs	1.9 mg/kg	5 mg/kg	None
<i>PD2-090110-19-SD/TS20467</i>	<i>09.01.10</i>	<i>09.03.10</i>	<i>1009006</i>	<i>TriMatrix Laboratories</i>	<i>RA 6, Grid 11</i>	<i>PCBs</i>	<i>1.5 mg/kg</i>	<i>5 mg/kg</i>	<i>None</i>

See notes on page 7.

Georgia-Pacific LLC
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Table A — Summary of Samples Collected and Data Received in September 2010

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Performance Standard	Response Action / Notes
Soil/Sediment Confirmation Samples (cont'd)									
TS20468	09.01.10	09.03.10	KAL585	TAL	RA6, Grid 12	PCBs	3.0 mg/kg	5 mg/kg	None
TS20469					RA6, Grid 13	PCBs	0.065 mg/kg	5 mg/kg	None
TS20470					RA6, Grid 14	PCBs	0.087 mg/kg	5 mg/kg	None
TS20471					RA6, Grid 15	PCBs	0.83 mg/kg	5 mg/kg	None
TS20472					RA6, Grid 16	PCBs	0.27 mg/kg	5 mg/kg	None
TS20473					RA6, Grid 17	PCBs	1.0 mg/kg	5 mg/kg	None
TS20474					RA6, Grid 18	PCBs	14 mg/kg	5 mg/kg	additional excavation and sampling warranted (TS20483)
TS20475	09.01.10	09.02.10	103603	KAR	Oxbow Grid 17	PCBs	5.8 mg/kg	5 mg/kg	resample of TS20453 (collected in August), additional excavation and sampling warranted (TS20478)
TS20476	09.01.10	09.02.10	103618	KAR	Oxbow Grid 12	PCBs	1.5 mg/kg	1 mg/kg	additional excavation and sampling warranted (TS20479)
TS20477	09.02.10	09.07.10	KAL586	TAL	RA 5B, Grid 17A	PCBs	2.9 mg/kg	5 mg/kg	resample of TS20441 (collected in August), no additional excavation and sampling warranted
TS20478	09.02.10	09.03.10	103638	KAR	Oxbow Grid 17	PCBs	0.33 mg/kg U	5 mg/kg	None
TS20479					Oxbow Grid 12	PCBs	0.33 mg/kg U	5 mg/kg	None
TS20480 ⁸ [TS20481]	09.07.10	09.08.10	103678	KAR	Oxbow Grid 27	PCBs [PCBs]	4.0 mg/kg [0.36 mg/kg]	1 mg/kg [1 mg/kg]	additional excavation and sampling warranted (TS20487) additional excavation based on sample result for TS20480
<i>PD2-090710-20-SD/TS20480</i> <i>PD2-090710-20-SD-DP/TS20480</i>	<i>09.07.10</i>	<i>09.14.10</i>	<i>1009070</i>	<i>TriMatrix Laboratories</i>	<i>Oxbow Grid 27</i>	<i>PCBs</i> <i>[PCBs]</i>	<i>0.47 mg/kg</i> <i>[0.32 mg/kg]</i>	<i>1 mg/kg</i> <i>[1 mg/kg]</i>	<i>additional excavation based on sample result for TS20480</i> <i>additional excavation based on sample result for TS20480</i>

See notes on page 7.

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Table A — Summary of Samples Collected and Data Received in September 2010

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Performance Standard	Response Action / Notes
Soil/Sediment Confirmation Samples (cont'd)									
TS20482	09.07.10	09.08.10	103678	KAR	Oxbow Grid 28	PCBs	0.53 mg/kg	1 mg/kg	None
TS20483					RA6, Grid 18	PCBs	0.33 mg/kg U	5 mg/kg	None
TS20484					RA6, Grid 9	PCBs	2.9 mg/kg	5 mg/kg	None
TS20485					RA6, Grid 7	PCBs	4.3 mg/kg	5 mg/kg	None
TS20486					RA6, Grid 2	PCBs	0.33 mg/kg U	5 mg/kg	None
TS20487	09.10.10	09.10.10	103747	KAR	Oxbow Grid 27	PCBs	1.4 mg/kg	5 mg/kg	None
TS20488	09.21.10	09.22.10	103940	KAR	RA 5B, Grid 12	PCBs	8.4 mg/kg	5 mg/kg	additional excavation and sampling warranted (TS20492)
PD2-092110-21-SD/TS20488^b	09.21.10	NR	NR	TriMatrix Laboratories	RA 5B, Grid 12	PCBs	-	5 mg/kg	-
TS20489	09.21.10	09.22.10	103940	KAR	RA 5B, Grid 13	PCBs	0.33 mg/kg U	5 mg/kg	None
TS20490					RA 5B, Grid 10	PCBs	1.6 mg/kg	5 mg/kg	None
TS20491	09.22.10	09.22.10	103951	KAR	RA 5B, Grid 11	PCBs	3.3 mg/kg	5 mg/kg	None
TS20492	09.23.10	09.23.10	103893	KAR	RA 5B, Grid 12	PCBs	8.1 mg/kg	5 mg/kg	additional excavation and sampling warranted (TS2052 and [TS20503])
TS20493					RA 5B, Grid 24	PCBs	0.33 mg/kg U	5 mg/kg	None
TS20494					RA 5B, Grid 23	PCBs	4.5 mg/kg	5 mg/kg	None
TS20495	09.23.10	09.24.10	103971	KAR	RA 5B, Grid 20C	PCBs	2.2 mg/kg	5 mg/kg	None
TS20496					RA 5B, Grid 19C	PCBs	0.33 mg/kg U	5 mg/kg	None
TS20497	09.24.10	09.24.10	103987	KAR	RA 5B, Grid 18B	PCBs	0.33 mg/kg U	5 mg/kg	None
TS20498					RA 5B, Grid 17B	PCBs	0.33 mg/kg U	5 mg/kg	None

See notes on page 7.

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Table A — Summary of Samples Collected and Data Received in September 2010

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Performance Standard	Response Action / Notes
Soil/Sediment Confirmation Samples (cont'd)									
TS20499	09.24.10	09.27.10	104012	KAR	RA 5B, Grid 14C	PCBs	4.9 mg/kg	5 mg/kg	None
TS20500					RA 5B, Grid 14B	PCBs	0.42 mg/kg	5 mg/kg	None
TS20501					RA 5B, Grid 14A	PCBs	1.3 mg/kg	5 mg/kg	None
TS20502 [TS20503]	09.28.10	09.29.10	104037	KAR	RA 5B, Grid 12	PCBs [PCBs]	0.33 mg/kg U [0.33 mg/kg U]	5 mg/kg [5 mg/kg]	None [None]
Surface Water Samples									
TS30179	08.19.10	09.10.10	KAL578	TAL	RA 5B; 300 feet downstream	PCBs	0.047 mg/L U	-	None
TS30180					RA 5B; 200 feet upstream	PCBs	0.048 mg/L U	-	None
TS30181					Rinse Blank	PCBs	0.049 mg/L U	-	None
TS30182	08.26.10	09.10.10	KAL582	TAL	RA 5B; 300 feet downstream	PCBs	0.048 mg/L U	-	None
TS30183					RA 5B; 200 feet upstream	PCBs	0.048 mg/L U	-	None
TS30184					Rinse Blank	PCBs	0.047 mg/L U	-	None
TS30185 [TS30186]	09.02.10	09.20.10	KAL587	TAL	RA 6, 300 feet downstream	PCBs PCBs	0.048 mg/L U [0.047 mg/L U]	- [-]	None [None]
TS30187					RA 6, 200 feet upstream	PCBs	0.048 mg/L U	-	None
TS30188					Rinse Blank	PCBs	0.057 mg/L U	-	None
TS30189	09.09.10	09.20.10	KAL588	TAL	RA 5B, 300 feet downstream	PCBs	0.054 mg/L U	-	None
TS30190					RA 5B, 200 feet upstream	PCBs	0.049 mg/L U	-	None
TS30191					Rinse Blank	PCBs	0.047 mg/L U	-	None

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Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Performance Standard	Response Action / Notes
Surface Water Samples (cont'd)									
TS30192	09.16.10	09.24.10	KAL590	TAL	RA 5B, 300 feet downstream	PCBs	0.049 mg/L U	-	None
TS30193					RA 5B, 200 feet upstream	PCBs	0.049 mg/L U	-	None
TS30194					Rinse Blank	PCBs	0.048 mg/L U	-	None
TS30195	09.23.10	09.29.10	KAL593	TAL	RA 5B, 300 feet downstream	PCBs	0.050 mg/L U	-	None
TS30196					RA 5B, 200 feet upstream	PCBs	0.050 mg/L U	-	None
TS30197					Rinse Blank	PCBs	0.050 mg/L U	-	None
TS30198	09.30.10	NR	NR	TAL	RA 5B, 300 feet downstream	PCBs	-	-	-
TS30199					RA 5B, 200 feet upstream	PCBs	-	-	-
TS30200					Rinse Blank	PCBs	-	-	-

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Table A — Summary of Samples Collected and Data Received in September 2010

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Performance Standard	Response Action / Notes
Water Treatment Samples									
W_SA1_In_012	09.13.10	09.17.10	KAL589	TAL	Influent; SA 1 Water Treatment	PCBs	0.179 µg/L	No Action Limit	None
W_SA1_RM_012					Right side Mid-fluent; SA 1 Water Treatment	PCBs	0.048 µg/L U	No Action Limit	None
W_SA1_RE_012					Right side Effluent; SA 1 Water Treatment	PCBs and TSS	0.048 µg/L U	Monthly Average of 2.6 x 10 ⁻⁵ µg/L	None: TSS = 12.4 mg/L, Action Limit = 45 mg/L
W_SA1_LM_012					Left side Mid-fluent; SA 1 Water Treatment	PCBs	0.026 µg/L J	No Action Limit	None
W_SA1_LE_012					Left side Effluent; SA 1 Water Treatment	PCBs and TSS	0.027 µg/L J	Monthly Average of 2.6 x 10 ⁻⁵ µg/L	None: TSS = 5.5 mg/L, Action Limit = 45 mg/L
W_SA1_In_013	09.20.10	09.23.10	KAL591	TAL	Influent; SA 1 Water Treatment	PCBs	0.11 µg/L	No Action Limit	None
W_SA1_RM_013					Right side Mid-fluent; SA 1 Water Treatment	PCBs	0.048 µg/L U	No Action Limit	None
W_SA1_RE_013					Right side Effluent; SA 1 Water Treatment	PCBs, TP, and TSS	0.050 µg/L U	Monthly Average of 2.6 x 10 ⁻⁵ µg/L	None: TSS = 0.8 mg/L, Action Limit = 45 mg/L; TP=0.027 mg/L U, No Action Limit
W_SA1_LM_013					Left side Mid-fluent; SA 1 Water Treatment	PCBs	0.047 µg/L U	No Action Limit	None
W_SA1_LE_013					Left side Effluent; SA 1 Water Treatment	PCBs, TP, and TSS	0.048 µg/L U	Monthly Average of 2.6 x 10 ⁻⁵ µg/L	None: TSS = 0.5 mg/L, Action Limit = 45 mg/L; TP=0.010 mg/L U, No Action Limit
W_SA1_In_014	09.23.10	09.27.10	KAL592	TAL	Influent; SA 1 Water Treatment	PCBs	0.10 µg/L	No Action Limit	None
W_SA1_RM_014					Right side Mid-fluent; SA 1 Water Treatment	PCBs	0.054 µg/L U	No Action Limit	None
W_SA1_RE_014					Right side Effluent; SA 1 Water Treatment	PCBs and TSS	0.055 µg/L U	Monthly Average of 2.6 x 10 ⁻⁵ µg/L	None: TSS = 1.5 mg/L, Action Limit = 45 mg/L
W_SA1_LM_014					Left side Mid-fluent; SA 1 Water Treatment	PCBs	0.051 µg/L U	No Action Limit	None
W_SA1_LE_014 ^a					Left side Effluent; SA 1 Water Treatment	PCBs and TSS	0.049 µg/L U	Monthly Average of 2.6 x 10 ⁻⁵ µg/L	None: TSS = 1.3 mg/L, Action Limit = 45 mg/L

See notes on page 7.

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Table A — Summary of Samples Collected and Data Received in September 2010

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Performance Standard	Response Action / Notes
Water Treatment Samples (cont'd)									
<i>PD2-092310-03-WT/W_SA1_LE_014^b</i>	<i>09.23.10</i>	<i>NR</i>	<i>NR</i>	<i>TriMatrix Laboratories</i>	<i>Left side Effluent; SA 1 Water Treatment</i>	<i>PCBs</i>	<i>-</i>	<i>Monthly Average of 2.6 x 10-5 µg/L</i>	<i>-</i>
W_SA1_In_015	09.28.10	09.30.10	KAL595	TAL	Influent; SA 1 Water Treatment	PCBs	0.14 µg/L	No Action Limit	None
W_SA1_RM_015					Right side Mid-fluent; SA 1 Water Treatment	PCBs	0.050 µg/L U	No Action Limit	None
W_SA1_RE_015					Right side Effluent; SA 1 Water Treatment	PCBs, TP, and TSS	0.049 µg/L U	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = 1.0 mg/L, Action Limit = 45 mg/L; TP=0.010 mg/L U, No Action Limit
W_SA1_LM_015					Left side Mid-fluent; SA 1 Water Treatment	PCBs	0.050 µg/L U	No Action Limit	None
W_SA1_LE_015 [W_SA1_DUP_006]					Left side Effluent; SA 1 Water Treatment	PCBs, TP, and TSS [PCBs, TP, and TSS]	0.049 µg/L U [0.051 µg/L U]	Monthly Average of 2.6 x 10-5 µg/L [Monthly Average of 2.6 x 10-5 µg/L]	None: TSS = 0.9 mg/L, Action Limit = 45 mg/L; TP=0.056 mg/L, No Action Limit [None: TSS = 1.0 mg/L, Action Limit = 45 mg/L; TP=0.010 mg/L U, No Action
Fill Material Sampling									
TS10103	09.27.10	NR	NR	TAL	9-part composite sample from topsoil	PCBs, TCL VOCs, TCL SVOCs, RCRA metals, and TCL pesticides, total organic carbon, grain size, pH, DROs, and GROs	-	-	-

Notes:

a - Split of the sample collected by USEPA.

b - Hard copy of analytical report not yet received, but USEPA representative has verbally confirmed that PCB concentration does not exceed action limit.

* Duplicate samples are shown in brackets.

* Analytical results have not been validated.

* USEPA split sample results shown in bold italics.

* PCB performance standard for oxbow confirmation samples is 1 mg/kg for initial samples and 5 mg/kg for samples collected after additional excavation. See Section 5.5 of the Design Report for additional information.

J - The compound was positively identified; however, the associated numerical value is an estimated concentration only because the compound was identified at a concentration below reporting limit but above the method detection limit.

DROs - diesel range organics

GROs - gasoline range organics

KAR - KAR Laboratories, Inc.

mg/kg - milligrams per kilogram

mg/L - milligrams per liter.

NR - Not Received

PCBs - polychlorinated biphenyls

RA - Removal Area

RCRA - Resource Conservation and Recovery Act

SA - Staging Area

SVOCs - semi-volatile organic compounds

TAL - TestAmerica Laboratories, Inc.

TCL - Target Compound List

TP - total phosphorus.

TSS - Total Suspended Solids

U - Compound analyzed but not detected at a concentration above the reporting limit

µg/L - micrograms per liter.

USEPA - United States Environmental Protection Agency

VOCs - volatile organic compounds